IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application of

Applicant   : Dan Thaxton
Serial No.   : 10/079,679
Filed   : February 20, 2002
Title   : DOCUMENT SECURITY PROTECTION ANALYSIS ASSISTANT
Docket   : STD 1067 PA
Examiner   : Kamal, Shahid
Art Unit   : 3621
Conf. No.   : 6750

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Prior to filing an appeal brief in the present application, and concurrently with filing a Notice of Appeal, applicant submits this request for review of the final rejection of December 27, 2007. No amendments are filed with this response.

Summary of Applicant's Position

The Vrain reference does not disclose the claimed concepts of: a.) assessing compatibility of various, selected security features; b.) evaluating the relative ratings of selected security features; c.) developing a security rating for a document under consideration; d.) providing a rating system to assess security based on the selected security features; and e.) basing document security ratings on a composite of rating scores for features included on the document.

Discussion of the Vrain Reference

The Vrain reference is only marginally relevant to the present application. The Vrain reference discloses a computer aided system for designing and ordering customized identification documents, such as for example ID cards, with various security features. The Vrain system that has a menu of these security features. This is as far as the disclosure of Vrain goes, however. <u>Vrain does not disclose a system for evaluating various combinations of document security features for a document, nor does it disclose a system for rating, in a meaningful way, compatibility or the effectiveness of various security features that might be included on a document.</u>

A review of independent claim 1 of the present application, and the Vrain reference, reveals that the Vrain reference does <u>not disclose</u> performing <u>any</u> of the four steps called for by claim 1. Claim 1 recites "processing data relating to selected security features of said document, said security features each having associated compatibility and relative rating information." The Vrain reference does not disclose security features that have associated "compatibility and relative rating information." Claim 1 specifies "revising said selected security features of said document to resolve any compatibility issues." There is nothing disclosed in the Vrain reference regarding resolving compatibility issues between security features. The Examiner cites a number of paragraphs in the Vrain specification, but none has the disclosure which the Examiner asserts. The Examiner's reference to <u>software compatibility</u> has <u>nothing to do with the "compatibility" of the various security features</u>. Compatibility of security features refers to whether security features are capable of simultaneous use on a single security document. For example, a security coating might not function properly on a particular kind of document, or might not work with a second security feature that requires an uncoated surface or that requires a surface that is coated with a different material. The Vrain reference simply does not address the compatibility of security features.

Claim 1 goes on to recite "evaluating said relative rating information of said selected security features to determine a document security rating of said document." The Examiner points to paragraphs 0019, 0021, 0048 and 0065 of Vrain, and asserts that badge design guidance data is provided by the Vrain system. In point of fact, the noted paragraphs of Vrain teach nothing other than that general badge design guidance data can be securely stored. There is no teaching in Vrain of evaluating <u>relative rating information</u> for the security features, and certainly no teaching of determining a "document security rating" for a security document.

Finally, claim 1 calls for "presenting said document security rating of said document" and nothing of the sort is suggested in Vrain. As pointed out previously, the Vrain system does not compute a security rating for a security document. It is clear, then, that Vrain also does not present a "report" of such a rating.

The Vrain reference differs significantly in its disclosure from the claimed method in the present application. The Vrain system stores data about various security features that can be added to an identification card. The Vrain system apparently provides the user with information about the advantages and disadvantages of the various security features. If one of the security features is selected, the Vrain system prompts the user to enter the necessary security feature design data. The Vrain reference does <u>not</u> address the compatibility of the various security features (that is, whether such features can be used at the same time on the same document, and are therefore "compatible"), <u>nor</u> does the Vrain system provide relative rating information (that is, information that rates or scores a document design so that the user can obtain an objective comparison of security).

Claim 20 is directed to a computer-readable medium that is capable of instructing a processor of a computer to evaluate security features of a document and to rate the security level of the document. The Vrain reference does not teach a system that evaluates security features. The Vrain reference does not teach a system that rates the

security level of a document. Finally, the Vrain system does not perform the steps that the claimed computer-readable medium instructs a computer processor to perform.

Claims 2 - 19 depend either directly or ultimately from claim 1. These claims are therefore patentable over the Vrain reference for the same reasons as addressed above with respect to Vrain. Further, these claims contain additional limitations that are in no way suggested by Vrain. For example, claim 10 provides that "certain said security features are made unselectable based upon received said document design information." There is no teaching of this technique for eliminating the selection of conflicting or inappropriate security features.

It is submitted that all of the claims currently presented in the instant application are in condition for allowance. The Vrain reference simply does not include a disclosure that can be said to anticipate any of the claims in the instant application.

Respectfully submitted,
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